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Attorney for Defendant
JASON CARUCCI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON CARUCCI,

Defendant.

Case No. CR 19-cr-00574 BLF

**STIPULATION CONTINUING STATUS
CONFERENCE AND EXCLUDING
TIME**

Defendant Carucci is on for status on March 24, 2020. The parties are still in the process of negotiating a disposition. Defense counsel is still investigating the case. Counsel's ability to do so has been impeded by the recent coronavirus health crisis. The parties therefore stipulate and agree that the status conference currently set for March 24, 2020 may be vacated and rescheduled for June 16, 2020.

It is further stipulated that the time from the signing of this stipulation to June 16, 2020 may be excluded from the time in which this case must be brought to trial under the Speedy Trial Act, 18 U.S.C. 3141(h)(7)(A), because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest

1 of the public and the defendant in a speedy trial based on defense counsel's need to investigate and prepare
2 the case.

3 **SO STIPULATED.**

4 DATED: March 17, 2020

5 /S/
6 JOHN BOSTIC
7 Assistant U.S. Attorney

8 DATED: March 17, 2020

9 /S/
10 ERIK BABCOCK
11 Attorney for Defendant CARUCCI


12 **PROPOSED ORDER**

13
14 Good cause appearing, the status conference set for March 24, 2020 is hereby vacated and
15 rescheduled for June 16, 2020.

16 Based on the stipulation of the parties above, the Court finds that the time from March 24, 2020 to
17 June 16, 2020 may be excluded from the time in which this case must be brought to trial under the Speedy
18 Trial Act, 18 U.S.C. 3141(h)(7)(A), because it results from a continuance granted by the Court at
19 defendant's request on the basis of the Court's finding that the ends of justice served by taking such action
20 outweigh the best interest of the public and the defendant in a speedy trial based on defense counsel's
21 need to investigate and prepare the case.
22

23 **IT IS SO ORDERED.**

24
25
26 DATED: March 18, 2020

27 
28 HON. BETH L. FREEMAN
United States District Judge